

Exhibit 4

Connecticut Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Connecticut – Meta Proposal

Search Terms: Meta made its most recent counterproposal on December 5, 2024 to the Connecticut Governor’s Office, who has agreed to the terms except that it wishes to apply a time period starting on January 1, 2015 instead of 2012. Meta also has disputes with the following agencies with which search term negotiations have stalled: (i) the Commission for Educational Technology (“CET”). (ii) the Department of Education (“DOE”), and (iii) the Department of Children and Families (“DCF”). At a high level, Meta’s proposal involves (i) one standalone search and (ii) ten search combinations that require either “Social Media Terms” or substantive “Harm Terms” to occur “within 200” of one of the following “Youth Terms”:

("minor" OR "youth" OR young OR "kid" OR kids OR "teen" OR "adolescent" OR "preteen" OR "pre-teen" OR "tween" OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age)

#	Standalone Search
1	“adverse childhood experience” OR “adverse childhood experiences”
#	Social Media Terms
2	“Youth Terms” w/200 ("social media" OR “social network” OR "facebook" OR "Instagram" OR Insta OR "meta" OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR “screen time” OR screentime OR DM OR “direct message” OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR “Yik Yak” OR finsta)
	Harm Terms
3	“Youth Terms” w/200 (("mental health" OR wellness OR "wellbeing" OR "depress" OR depression OR depressed OR "anxiety" OR anxious OR “sleep disturbances” OR "insomnia" OR "suicide" OR suicidal OR suicides OR “self-harm” OR selfharm OR OR “compulsive use” OR "bulimia" OR "anorexia" OR "addiction")
4	“Youth Terms” w/200 (“pro-ana” OR “BMI” OR overweight OR fat OR obese OR obesity OR bully OR cyberbully OR harass OR sextortion OR transphobia OR homophobia OR racism OR sexism OR grooming OR pedophile OR predator OR dopamine OR “social reward” OR timespent OR “time spent” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)

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5	“Youth Terms” w/200 (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
6	“Youth Terms” w/200 (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
7	“Youth Terms” w/200 (negative w/3 (appearance OR experience OR affect* OR effect*))
8	“Youth Terms” w/200 (compar* w/5 (appearance OR social OR other* OR negative))
9	“Youth Terms” w/200 (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
10	“Youth Terms” w/200 (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
11	“Youth Terms” w/200 (isolat* OR (social* w/5 distanc*))

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Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Custodians who were affirmatively proposed and agreed to by the Connecticut AG’s office during the course of the Parties’ negotiations:

Agency	Custodian
Governor’s Office	Ryan Drajewicz
Governor’s Office	Paul Mounds
Governor’s Office	Jonathan Dach
Governor’s Office	Matthew Brokman
Governor’s Office	Bob Clark
Governor’s Office	Nora Dannehy
Governor’s Office	Natalie Braswell
Governor’s Office	Maribel La Luz
Governor’s Office	Max Reiss
Governor’s Office	Anthony Anthony
Governor’s Office	Adam Joseph
Governor’s Office	Julia Bergman
Governor’s Office	Jamal Gatling
Governor’s Office	Bobby Martinez
Governor’s Office	Cameron Hand

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Agency	Custodian
Governor's Office	Mohit Agrawal
Governor's Office	Patrick Hulin
CET	Doug Casey
CET	Mark Raymond
DCF	Michael Williams
DCF	Elizabeth Calvi
DCF	Vincent Russo
DCF	Ken Mysogland
DCF	Peter Yazbak
DCF	Francis Gregory
DCF	Maribel Martinez
DCF	Nicole Taylor

Meta's proposed custodians for DOE and DCF:

Agency	Custodian	Title
DOE	Charlene M. Russell-Tucker	Commissioner
DOE	Charles E. Hewes	Deputy Commissioner
DOE	Sinthia Sone-Moyano	Deputy Commissioner
DOE	Melissa Wlodarczyk Hickey	Chair, Digital Citizenship, Internet Safety, and Media Literacy Council

Connecticut Agency Discovery Proposal**Connecticut Office of the Governor (“OTG”) Custodians**

Ryan Drajewicz	Former Chief of Staff
Paul Mounds	Former Chief of Staff
Jonathan Dach	Former Chief of Staff
Matthew Brokman	Chief of Staff
Bob Clark	Former General Counsel
Nora Dannehy	Former General Counsel
Natalie Braswell	General Counsel
Maribel La Luz	Former Communications Director
Max Reiss	Former Communications Director
Anthony Anthony	Former Communications Director
Adam Joseph	Former Communications Director
Julia Bergman	Communications Director
Jamal Gatling	Former Constituent Services Senior Staff
Bobby Martinez	Former Constituent Services Senior Staff
Cameron Hand	Constituent Services Senior Staff
Mohit Agarwal	Former Policy Director
Patrick Hulin	Policy Director

Proposed Search Terms and Targeted Searches for Use by OTG

Search Terms <ul style="list-style-type: none"> • RFPs: 2-6, 9-10, 12-14, 16-19, 28 • Time Period: 1/1/2015 – 4/1/2024 	(“social media” OR “social network” OR “facebook” OR “Instagram” OR Insta OR “meta” OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR “screen time” OR screentime OR DM OR “direct message” OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR “Yik Yak” OR finsta) Near /200 (“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age)
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	<p>“adverse childhood experience” OR “adverse childhood experiences”</p> <p>(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 (“mental health” OR wellness OR “wellbeing” OR “depress” OR depression OR depressed OR “anxiety” OR anxious OR “sleep disturbances” OR “insomnia” OR “suicide” OR suicidal OR suicides OR “self-harm” OR selfharm OR “compulsive use” OR “bulimia” OR “anorexia” OR “addiction”)</p> <p>(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 “pro-ana” OR “BMI” OR overweight OR fat OR obese OR obesity OR bully OR cyberbully OR harass OR sextortion OR transphobia OR homophobia OR racism OR sexism OR grooming OR pedophile OR predator OR dopamine OR “social reward” OR timespent OR “time spent” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”</p> <p>(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR</p>
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	under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
	(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
	(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 (negative w/3 (appearance OR experience OR affect* OR effect*))
	(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation

	w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 (compar* w/5 (appearance OR social OR other* OR negative))
	(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
	(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR teenage OR teen-age) Near /200 (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
	(“minor” OR “youth” OR young OR “kid” OR kids OR “teen” OR “adolescent” OR “preteen” OR “pre-teen” OR “tween” OR child OR children OR underage OR under-age OR student OR school* OR scholar* OR pupil* OR teens OR adolescents OR preteens OR pre-teens OR tweens OR minor OR underaged OR under-aged OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen w/5 z) OR (generation w/5 z) OR “gen-z” OR gen-zs OR (gen w/5 alpha) OR (generation w/5 alpha) OR gen-a OR teenager OR teen-ager OR teenagers OR teen-agers OR teenaged OR teen-aged OR “teen aged” OR “teen age” OR

	teenage OR teen-age) Near /200 (isolat* OR (social* w/5 distanc*))
Targeted Searches <ul style="list-style-type: none"> • RFPs: 7-8, 11 • Time Period: 1/1/2015 – 4/1/2024 	<ul style="list-style-type: none"> • <u>RFPs 7-8</u>: Manual searches of OTG social media posts and press releases. • <u>RFP 11</u>: Searching for complaints related to youth mental health and wellbeing and young users’ use of social media platforms.
Nothing Responsive or Objections	RFPs: 1, 15, 20-27, 29-45

Connecticut Department of Children and Families (“DCF”) Custodians

Michael Williams	Deputy Commissioner of Operations
Elizabeth Calvi	Visual Media Designer
Vincent Russo	Chief Administrator of Government Relations and Policy
Ken Mysogland	Chief Administrator of External Affairs
Peter Yazbak	Director of Communications
Francis Gregory	Administrator of Behavioral Health Community Services
Maribel Martinez	Senior Administrator of the Office of Clinical and Community Support
Nicole Taylor	Chief Administrator of the Office of Behavioral Health and Wellbeing

Proposed Targeted Searches for Use by DCF

Targeted Searches <ul style="list-style-type: none"> • RFPs: 2-6, 9-10, 12-14, 16-19, 28 • Time Period: 1/1/2015 – 4/1/2024 	Custodians, all of whom are high-level DCF managers, will conduct manual searches within their files for documents that are
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	responsive to these Requests, avoiding confidential child abuse and neglect case files.
Targeted Searches <ul style="list-style-type: none"> RFPs: 7-8 Time Period: 1/1/2015 – 4/1/2024 	Manual searches of DCF social media posts and press releases.
Nothing Responsive or Objections	RFPs: 1, 11, 15, 20-27, 29-45

Connecticut Department of Consumer Protection (“DCP”) Custodians

John Neumon	Former Investigation Division Director
Pam Brown	Director of Investigations
Lillie Myers	Secretary
Elisa Nahas	Legal Director
Julianne Avallone	General Counsel
David Cousins	Legal Program Director
Myrna Rodriguez	Paralegal Specialist
Robert Brancato	Lead Consumer Information Representative
Laura Edwards	Lead Consumer Information Representative
Paulette Annon	Assistant Legal Director
Caitlin Anderson	Liquor Control Division Director
Lila McKinley	Legal Program Director
Nicole Ayala	Former Staff Attorney
Jason Cohen	CP Division Director

Proposed Search Terms and Targeted Searches for Use by DCP

Search Terms <ul style="list-style-type: none"> RFPs: 2-6, 9-10, 12-14, 16-19, 28 Time Period: 1/1/2015 – 4/1/2024 	<ul style="list-style-type: none"> “social media” and “minor” OR “social media” and “youth” OR “social media” and “kid” OR “social media” and “teen” OR “mental health” and “wellbeing” OR “Facebook” and “minor” OR “Facebook” and “youth” OR “Facebook” and “kid” OR “Facebook” and “teen” OR “Instagram” and “minor” OR “Instagram” and “youth” OR “Instagram” and “kid” “Instagram” and “teen” “Meta” and “minor” OR “Meta” and “youth” OR “Meta” and “kid” OR “Meta” and “teen” OR “mental health” and “minor” OR
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	<ul style="list-style-type: none"> • “mental health” and “youth” OR • “mental health” and “kid” OR • “mental health” and “teen” OR • “wellbeing” and “minor” OR • “wellbeing” and “youth” OR • “wellbeing” and “kid” OR • “wellbeing” and “teen”
Targeted Searches <ul style="list-style-type: none"> • RFPs: 7-8, 11 • Time Period: 1/1/2015 – 4/1/2024 	<ul style="list-style-type: none"> • <u>RFPs 7-8</u>: Manual searches of DCP social media posts and press releases. • <u>RFP 11</u>: Searching for complaints related to youth mental health and wellbeing and young users’ use of social media platforms.
Nothing Responsive or Objections	<ul style="list-style-type: none"> • RFPs: 1, 15, 20-27, 29-45